

Dear Sirs,

These comments are lifted from someone else's filing but are offered as a point of reference for my own.

We are extremely pleased that the FCC has received a recommendation from NECA to have a 2008-2009 fund year reimbursement rate of \$2.7248, which includes \$1.131 to be used for STS outreach. It would be very wise of the FCC to accept this recommendation including the incentive to encourage providers to make information about STS available to more consumers. An extremely small percentage of STS consumers appear to know that this service is available.

While the reimbursement rate set by the FCC applies to interstate calls, the vast majority of STS calls are intrastate calls. Generally, states reimburse providers at a much lower rate than the federal rate. In fact, providers often take a big loss on STS in order to obtain a statewide TRS contract. For example, in California the STS rates paid to all providers is less than a \$1.50 per minute. Providers have informed the FCC that the cost of providing Speech-to-Speech is \$3.4546 per minute.

In making their decision the FCC needs to consider the impact this service could potentially have on those who have a speech disability. The thing that comes for most to mind is the potential for increased employability of people who have easy access to the use of telephones. While the use of the phone is taken for granted by many, take that ability away in the job-place and imagine what begins to happen. Employability decreases almost immediately. Now the \$3.45.. mentioned above is multiplied many times in terms of the cost of SSI. In the long run I believe this to be an economical proposition that the FCC should weigh carefully before dismissing.

Sincerely,  
James W. Fee, Jr., MS